

MICHELE BECKWITH
Acting United States Attorney
HADDY ABOUZEID
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

FILED

Feb 06, 2025

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

2:25-cr-0031 JAM

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARCUS ANDERSON,

Defendant.

CASE NO.

18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing in
Firearms Without a License; 18 U.S.C. § 933(A)(1)—
Firearms Trafficking (2 counts); 18 U.S.C. §
922(g)(1) – Felon in Possession of Firearm (6
counts); 18 U.S.C. §§ 924(d)(1), 934(a)(1)(A) and
(B), and 28 U.S.C. § 2461(c) – Criminal Forfeiture

I N D I C T M E N T

COUNT ONE: [18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing in Firearms Without a License]

The Grand Jury charges: T H A T

MARCUS ANDERSON,
defendant herein, beginning no later than on or about February 8, 2022, and continuing to on or about
March 2, 2023, in Sacramento and Placer Counties, State and Eastern District of California, not being a
licensed dealer and manufacturer of firearms as described in Title 18, United States Code, Section 923,
did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code,
Section 922(a)(1)(A).

///

///

///

1 COUNT TWO: [18 U.S.C. § 933(a)(1) – Firearms Trafficking]

2 The Grand Jury further charges: T H A T

3 MARCUS ANDERSON,

4 defendant herein, on or about December 9, 2022, in Sacramento County, State and Eastern District of
5 California, did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm, to
6 wit: a HS Produkt Model XDS .40 caliber pistol, with serial number S3517402, to another person, in and
7 affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use,
8 carrying and possession of the firearm by the recipient would constitute a felony, in violation of Title 18,
9 United States Code, Section 933(a)(1).

10 COUNT THREE: [18 U.S.C. § 933(a)(1) – Firearms Trafficking]

11 The Grand Jury further charges: T H A T

12 MARCUS ANDERSON,

13 defendant herein, on or about March 2, 2023, in Placer County, State and Eastern District of California,
14 did ship, transport, transfer, cause to be transported, and otherwise dispose of a firearm, to wit: a
15 Tanfoglio 9mm caliber pistol, with serial number AE04270, to another person, in and affecting interstate
16 and foreign commerce, knowing and having reasonable cause to believe that the use, carrying and
17 possession of the firearm by the recipient would constitute a felony, in violation of Title 18, United
18 States Code, Section 933(a)(1).

19 COUNT FOUR: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

20 The Grand Jury further charges: T H A T

21 MARCUS ANDERSON,

22 defendant herein, on or about February 8, 2022, in Sacramento County, State and Eastern District of
23 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
24 exceeding one year, specifically:

- 25 1) Burglary, in violation of California Penal Code Section 459, on or about April 28, 2017, in
26 Placer County, California;
- 27 2) Vandalism, in violation of California Penal Code Section 594(b)(1), on or about April 28,
28 2017, in Placer County, California; and,
- 3) Grand Theft, in violation of California Penal Code Section 487(A), on or about April 28,

2017, in Placer County, California;
did knowingly possess a firearm, specifically, an Auto-Ordnance Model 1911A1 .45 caliber pistol, with
serial number AOA24447, in and affecting commerce, in that said firearm had previously been
transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section
922(g)(1).

COUNT FIVE: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

The Grand Jury further charges: T H A T

MARCUS ANDERSON,

defendant herein, on or about March 14, 2022, in Sacramento County, State and Eastern District of
California, knowing that he had been convicted of a crime punishable by a term of imprisonment
exceeding one year, specifically:

- 1) Burglary, in violation of California Penal Code Section 459, on or about April 28, 2017, in
Placer County, California;
- 2) Vandalism, in violation of California Penal Code Section 594(b)(1), on or about April 28,
2017, in Placer County, California; and,
- 3) Grand Theft, in violation of California Penal Code Section 487(A), on or about April 28,
2017, in Placer County, California;

did knowingly possess a firearm, specifically, a Rossi .38 caliber revolver, with serial number W324021,
in and affecting commerce, in that said firearm had previously been transported in interstate and foreign
commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIX: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

The Grand Jury further charges: T H A T

MARCUS ANDERSON,

defendant herein, on or about April 20, 2022, in Sacramento County, State and Eastern District of
California, knowing that he had been convicted of a crime punishable by a term of imprisonment
exceeding one year, specifically:

- 1) Burglary, in violation of California Penal Code Section 459, on or about April 28, 2017,
in Placer County, California;
- 2) Vandalism, in violation of California Penal Code Section 594(b)(1), on or about April 28,
2017, in Placer County, California; and,

1 3) Grand Theft, in violation of California Penal Code Section 487(A), on or about April 28,
2 2017, in Placer County, California;

3 did knowingly possess a firearm, specifically, a KelTec .380 pistol, with serial number J6V89, in and
4 affecting commerce, in that said firearm had previously been transported in interstate and foreign
5 commerce, in violation of Title 18, United States Code, Section 922(g)(1).

6 COUNT SEVEN: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

7 The Grand Jury further charges: T H A T

8 MARCUS ANDERSON,

9 defendant herein, on or about August 12, 2022, in Sacramento County, State and Eastern District of
10 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
11 exceeding one year, specifically:

12 1) Burglary, in violation of California Penal Code Section 459, on or about April 28, 2017,
13 in Placer County, California;

14 2) Vandalism, in violation of California Penal Code Section 594(b)(1), on or about April 28,
15 2017, in Placer County, California; and,

16 3) Grand Theft, in violation of California Penal Code Section 487(A), on or about April 28,
17 2017, in Placer County, California;

18 did knowingly possess a firearm, specifically, a HS Produkt Model XDM .45 caliber pistol, with serial
19 number MG688385, in and affecting commerce, in that said firearm had previously been transported in
20 interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

21 COUNT EIGHT: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

22 The Grand Jury further charges: T H A T

23 MARCUS ANDERSON,

24 defendant herein, on or about December 9, 2022, in Sacramento County, State and Eastern District of
25 California, knowing that he had been convicted of a crime punishable by a term of imprisonment
26 exceeding one year, specifically:

27 1) Burglary, in violation of California Penal Code Section 459, on or about April 28, 2017,
28 in Placer County, California;

2) Vandalism, in violation of California Penal Code Section 594(b)(1), on or about April 28,
2017, in Placer County, California; and,

3) Grand Theft, in violation of California Penal Code Section 487(A), on or about April 28, 2017, in Placer County, California;

did knowingly possess a firearm, specifically, a HS Produkt Model XDS .40 caliber pistol, with serial number S3517402, in and affecting commerce, in that said firearm had previously been transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINE: [18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm]

The Grand Jury further charges: T H A T

MARCUS ANDERSON,

defendant herein, on or about March 2, 2023, in Placer County, State and Eastern District of California, knowing that he had been convicted of a crime punishable by a term of imprisonment exceeding one year, specifically:

1) Burglary, in violation of California Penal Code Section 459, on or about April 28, 2017, in Placer County, California;

2) Vandalism, in violation of California Penal Code Section 594(b)(1), on or about April 28, 2017, in Placer County, California; and,

3) Grand Theft, in violation of California Penal Code Section 487(A), on or about April 28, 2017, in Placer County, California;

did knowingly possess a firearm, specifically, a Tanfoglio 9mm caliber pistol, with serial number AE04270, in and affecting commerce, in that said firearm had previously been transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION: [18 U.S.C. §§ 924(d)(1), 934(a)(1)(A) and (B), and 28 U.S.C. § 2461(c) – Criminal Forfeiture]

1. Upon conviction of one or more of the offenses alleged in Counts One and Four through Eight of this Indictment, defendant MARCUS ANDERSON shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the knowing or willful commission of the offenses.

2. Upon conviction of one or more of the offenses alleged in Counts Two and Three of this Indictment, defendant MARCUS ANDERSON shall forfeit to the United States pursuant to Title 18, United States Code, Sections 934(a)(1)(A) and (B), any property constituting or derived from proceeds

1 obtained, directly or indirectly, as the result of such violations and any property used, or intended to be
2 used, in any manner or part, to commit or to facilitate the commission of such violations.

3 3. If any property subject to forfeiture, as a result of the offenses alleged in Counts One
4 through Nine of this Indictment, for which defendant is convicted:


- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a third party;
- 7 c. has been placed beyond the jurisdiction of the Court;
- 8 d. has been substantially diminished in value; or
- 9 e. has been commingled with other property which cannot be divided without
10 difficulty;

11 it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), as
12 incorporated by Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of
13 defendant, up to the value of the property subject to forfeiture.

14
15 A TRUE BILL.

16 **/s/ Signature on file w/AUSA**

17
18 FOREPERSON

19 
20 MICHELE BECKWITH
21 Acting United States Attorney
22
23
24
25
26
27
28

No. _____

UNITED STATES DISTRICT COURT

Eastern District of California

Criminal Division

THE UNITED STATES OF AMERICA

vs.

MARCUS CALVIN ANDERSON

I N D I C T M E N T

VIOLATION(S): 18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing in Firearms Without a License;
18 U.S.C. § 933(A)(1) – Firearms Trafficking (2 counts);
18 U.S.C. § 922(g)(1) – Felon in Possession of Firearm (6 counts);
18 U.S.C. §§ 924(d)(1), 934(a)(1)(A) and (B), and 28 U.S.C. § 2461(c) – Criminal Forfeiture

A true bill,

/s/ Signature on file w/AUSA

Foreman.

Filed in open court this 6th *day*

of February *, A.D. 20* 25

/s/ R. Alvarez

Clerk.

No Bail Warrant Pending Hearing

Bail, \$ _____

Chi Soo Kim
CHI SOO KIM

UNITED STATES MAGISTRATE JUDGE

United States v. Marcus ANDERSON
Penalties for Indictment

COUNT ONE:

VIOLATION: 18 U.S.C. § 922(a)(1)(A) – Unlawful Dealing in Firearms

PENALTIES: Imprisonment of up to 5 years; or
Fine of up to \$250,000; or both fine and imprisonment
Supervised release of up to 3 years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT TWO-THREE:

VIOLATION: 18 U.S.C. § 933(a)(1) – Firearm Trafficking

PENALTIES: Not more than 15 years,
Not more than \$250,000 fine or both
A three-year term of Supervised Release

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT FOUR-SIX:

VIOLATION: 18 U.S.C. § 922(g) – Felon in possession of firearm

PENALTIES: Maximum of 10 years in prison,
A fine of up to \$250,000 fine, or both,
A term of Supervised Release of up to three years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

COUNT SEVEN-NINE:

VIOLATION: 18 U.S.C. § 922(g) – Felon in possession of firearm

PENALTIES: Maximum of 15 years in prison,
A fine of up to \$250,000 fine, or both,
A term of Supervised Release of up to three years

SPECIAL ASSESSMENT: \$100 (mandatory on each count)

FORFEITURE ALLEGATION:

VIOLATION: 18 U.S.C. §§ 924(d)(1), 934(a)(1)(A) and (B), and 28 U.S.C. § 2461(c) - Criminal Forfeiture

PENALTIES: As stated in the charging document